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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19

20 LA ALLIANCE FOR HUMAN RIGHTS,
et al.,
21 Plaintiffs,
22 vs.
23 CITY OF LOS ANGELES, a Municipal
entity, et al.,
24 Defendants.

25 Case No. CV 20-02291 DOC (KES)

26 **DEFENDANTS' JOINT
STIPULATION REQUESTING
HEARING TO APPROVE BINDING
TERM SHEET**

27

28

JOINT STIPULATION REQUESTING HEARING ON BINDING TERM SHEET
Case No. CV 20-02291 DOC (KES)

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JOINT STIPULATION REQUESTING HEARING ON BINDING TERM SHEET
-1- Case No. CV 20-02291 DOC (KES)

1 **TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:**
2

3 Defendants City of Los Angeles and County of Los Angeles (together,
4 “Defendants”), by and through their respective counsel, hereby stipulate to the following:
5

6 **RECITALS**
7

8 WHEREAS, on May 22, 2020, the Honorable David O. Carter issued a
9 Preliminary Injunction directing Defendants to offer housing to people experiencing
10 homelessness (“PEH”) camped within 500 feet of freeway overpasses, underpasses, or
11 ramps and to humanely relocate these individuals at least 500 feet away from such areas
12 by no later than September 1, 2020 [Dkt. 123];
13

14 WHEREAS, on May 28, 2020, Defendants filed their Joint Request of City of Los
15 Angeles and County of Los Angeles for Order to Mediate (“Joint Request”) [Dkt. 124];
16

17 WHEREAS, on May 29, 2020, the Honorable David O. Carter granted Defendants’
18 Joint Request, and appointed the Honorable André Birotte Jr. to serve as the mediator
19 [Dkt. 125];
20

21 WHEREAS, on May 29, 2020, the Honorable André Birotte Jr. issued an Order
22 Setting Briefing Schedule and Mediation (“Scheduling Order”) [Dkt. 127];
23

24 WHEREAS, Defendants participated in a mediation with the Honorable André
25 Birotte Jr. on Thursday, June 11, 2020 at the County of Los Angeles’ Hall of
Administration and on Friday, June 12, 2020 at Los Angeles City Hall;
26

27 WHEREAS, Defendants reached agreement as a result of the mediation, and have
28 memorialized the terms in a Binding Term Sheet, subject to the Court’s approval;
29

30 WHEREAS, an executed copy of the Binding Term Sheet has been submitted to
31 the mediator, the Honorable André Birotte Jr.; and
32

33 WHEREAS, Defendants would like to discuss and obtain the approval of the
34 Binding Term Sheet from the Court.
35

36 JOINT STIPULATION REQUESTING HEARING ON BINDING TERM SHEET
37 -2- Case No. CV 20-02291 DOC (KES)

STIPULATION

NOW THEREFORE, IT IS HEREBY STIPULATED that Defendants jointly and respectfully request that the Court set a hearing to review and approve the Binding Term Sheet on Thursday, June 18, 2020 at 10:00 a.m., or at the Court's earliest convenience.

IT IS SO STIPULATED.

DATED: June 16, 2020

MARY C. WICKHAM

/s/ Lauren Black

Lauren M. Black

**Principal Deputy County Counsel
COUNTY OF LOS ANGLES**

DATED: June 16, 2020

MICHAEL N. FEUER, City Attorney

/s/ Scott Marcus

Scott Marcus

**Senior Assistant City Attorney
CITY OF LOS ANGELES**

Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(I), Byron J. McLain hereby attests that concurrence in the filing of this document and its contents was obtained from all signatories listed above.